REMARKS

In the final Office Action, the Examiner rejects claims 1-34 under 35 U.S.C. § 103(a) as unpatentable over BARRETT et al., Intermediaries: New Places for Producing and Manipulating Web Content," Computer Networks and ISDN Systems, April 1998, pp. 509-518. Applicants respectfully traverse.

By way of the present amendment, Applicants add new claims 35-37. No new matter has been added by way of the present amendment. Claims 1-37 are pending.

Claims 1-34 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over BARRETT et al. Applicants respectfully traverse.

Independent claim 1 is directed to a method for modifying a markup language document. The method includes receiving the markup language document at an intermediary server, where the markup language document has at least one script portion including at least one link to a resource; and modifying the at least one link within the script portion of the markup language document to link to the intermediary server. BARRETT et al. does not disclose or suggest this combination of features.

For example, BARRETT et al. does not disclose or suggest modifying the at least one link within the script portion of the markup language document to link to the intermediary server. The Examiner relies on pg. 510, col. 1, lines 22-45, pg. 512, col. 1, lines 42-44, Fig. 1, Fig. 5B, and Table 1 of BARRETT et al. for allegedly disclosing this feature of Applicants' claim 1 (final Office Action, pp. 3-4). Applicants disagree.

At pg. 510, col. 1, lines 21-45, BARRETT et al. discloses:

> Many applications fit the intermediary model of Web programming. Consider just a few:

> Web personalization
> Our work on intermediaries was motivated by an interest in personalizing the Web, that is, in changing the Web's behavior depending on the particular user and that user's history of browsing [1]. Based on explicit instructions or on observations of a user's browsing, intermediaries can formulate a model of the user and then alter what the user sees to personalize the browsing experience. For example, pages can be annotated with user notes or customized links, alerts to related Web pages can appear, or new resources, such as personal search engines, can be added.
> Document caching
> Document caching, a common feature of current Web browsers, can easily be cast in the intermediary mold. If the caching function is separated from the browser and implemented by an intermediary, the browser becomes simply a URL requester. In this case, the intermediary cache checks its store of pages to see whether the request can be satisfied locally or whether it must be sent to another intermediary or to the server.

This section of BARRETT et al. discloses that an intermediary may be used for web personalization, such as adding annotations to a page with user notes or customized links, adding alerts to related web pages, or adding new resources (e.g., personal search engines), and document caching. This section of BARRETT et al. in no way discloses or suggests modifying at least one link within a script portion of a markup language document to link to an intermediary server, as required by claim 1.

At pg. 512, col. 1, lines 42-44, BARRETT et al. discloses that editors modify outgoing requests for incoming documents and generators produce documents in response to requests. This section of BARRETT et al. in no way discloses that the editors or generators modify at least one link within a script portion of a markup language document to link to an intermediary server, as required by claim 1.

Fig. 1 of BARRETT et al. depicts that a request for a document is sent from a browser to an intermediary. If the requested document is not in the local cache of the intermediary, it is forwarded to the server intermediary, which produces the document. The document passes

through a customization intermediary that personalizes the document and then returns it to the browser (see pg. 510, col. 2). This figure of BARRETT et al. in no way discloses or suggests that the intermediary (or any other device in Fig. 1) modifies at least one link within a script portion of a markup language document to link to an intermediary, as required by claim 1.

Fig. 5 of BARRETT et al. (BARRETT et al. does include a Fig. 5B so Applicants assume that the Examiner intended to rely on Fig. 5 and not Fig. 5B) depicts the use of several Web Browser Intelligence (WBI) plugins to improve a wireless web browser. This figure of BARRETT et al. in no way discloses or suggests that the WBI plugins modify at least one link within a script portion of a markup language document to link to an intermediary server, as required by claim 1.

Table 1 of BARRETT et al. discloses that the Monitor/Editor/Generator (MEG) building blocks used to build intermediary applications include a request editor that can modify requests, a generator that produces a document that can satisfy a request or rejects a request, a document editor that can modify a document (which could be text, HTML, image, applet, etc.), a monitor that can receive a request and resulting document and perform some computation (e.g., gather statistics), and an autonomous block that can perform background computations that are not affiliated with a particular transaction (e.g., calculate user browsing statistics). Table 1 of BARRETT et al. in no way discloses or suggests that any of the above MEG building blocks modifies at least one link within a script portion of a markup language document to link to an intermediary server, as required by claim 1.

Further with respect to this feature of claim 1, the Examiner alleges that "Examiner directs Applicant to Table 1, which states that the action of the document editor is to modify

documents, which can be applets. Therefore, Barrett does teach that scripts are modified" (final Office Action, pg. 2). Applicants submit that the Examiner has ignored features of Applicants' claim 1.

Claim 1 specifically recites modifying the at least one link within the script portion of the markup language document to link to the intermediary server. Therefore, the mere fact that BARRETT et al.'s document editor is capable of modifying documents, which can include applets, in no way would lead one skilled in the art to conclude that BARRETT et al.'s document editor modifies at least one link within a script portion of a markup language document to link to the intermediary server, as required by Applicants' claim 1. The Examiner has not pointed to any section of BARRETT et al. that discloses this feature.

The Examiner also appears to rely on pp. 24 and 210 of EICH et al. (Netscape Navigator, Netscape Navigation Corporation, 1996) for allegedly disclosing that scripts are included in HTML documents (final Office Action, pp. 2-3). Applicants initially note that EICH et al. is not part of the official grounds of rejection. Applicants further submit that these pages of EICH et al. do not disclose or suggest modifying at least one link within a script portion of a markup language document to link to an intermediary server, as required by Applicants' claim 1.

Further with respect to this feature, the Examiner alleges in the Advisory Action, dated February 9, 2005, that "Examiner maintains that the modification of the document as described in the cited portions of Barrett teach the modification of a document which is created by a markup language and contains scripts and links and is redirected to other intermediary servers by the request editor (by modifying links/redirecting cookies to intermediaries)" (Advisory Action, pg. 2). Applicants respectfully traverse for at least the reasons given above. The Examiner has

not pointed to any section of BARRETT et al. that discloses or even suggests modifying the at least one link within the script portion of the markup language document to link to the intermediary server, as required by claim 1.

For at least the foregoing reasons, Applicants submit that claim 1 is patentable over BARRETT et al.

Claims 2-9 depend from claim 1. Therefore, Applicants submit that these claims are patentable over BARRETT et al. for at least the reasons given above with respect to claim 1. Moreover, these claims are patentable over BARRETT et al. for reasons of their own.

For example, claim 4 recites that the modifying includes scanning the markup language document to locate the script portion; searching the script portion to locate a hostname; producing a replacement hostname for the located hostname; and replacing the located hostname with the replacement hostname. At the outset, Applicants submit that since BARRETT et al. does not disclose modifying at least one link within a script portion of a markup language document to link to an intermediary server, BARRETT et al. cannot disclose or suggest the features of claim 4.

The Examiner relies on pg. 512, col. 1, lines 17-30, of BARRETT et al. for allegedly disclosing the above features of claim 4 (final Office Action, pg. 5). Applicants disagree.

At pg. 512, col. 1, lines 17-30, BARRETT et al. discloses:

> Our architecture for intermediaries is known as Web Browser Intelligence (WBI, pronounced "Webby"; [1]). WBI is a programmable proxy server that was designed for easy development and deployment of intermediary applications. Our goal was to produce a programming platform that can be used to implement all sorts of intermediaries, from simple server functions to complex image and page editing and distributed applications. The WBI architecture has been used by more than 20 programmers for numerous projects including intelligent agents, Web

> mapping, password management, document format conversion, collaborative filtering, and knowledge management.

This section of BARRETT et al. discloses that WBI can be used as an architecture for intermediaries. Contrary to the Examiner's allegation, this section of BARRETT et al. in no way discloses or suggests scanning a markup language document to locate a script portion, searching the script portion to locate a hostname, producing a replacement hostname for the located hostname, and replacing the located hostname with the replacement hostname, as required by Applicants' claim 4. If this rejection is maintained, Applicants request that the Examiner specifically point out where these features are disclosed in the above section of BARRETT et al.

Further with respect to claim 4, the Examiner admits that BARRETT et al. does not disclose the scanning and searching features of claim 4 and alleges "official notice is taken that it is old and well known in the networking art that in order to redirect a document it is advantageous to scan and search for the URL that is to be replaced" (final Office Action, pg. 5). Applicants submit that the Examiner has misinterpreted the features of claim 4.

As set forth above, claim 4 recites scanning the markup language document to locate the script portion, searching the script portion to locate a hostname, producing a replacement hostname for the located hostname, and replacing the located hostname with the replacement hostname. These features do not recite redirecting a document. Therefore, the Examiner's allegation regarding redirecting a document is immaterial to the features recited in Applicants' claim 4.

For at least these additional reasons, Applicants submit that claim 4 is patentable over BARRETT et al.

Independent claim 10 is directed to a method for modifying a markup language

document. The method includes receiving the markup language document at an intermediary server, where the markup language document has at least a script portion including at least one of function or property statements; and modifying at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server. BARRETT et al. does not disclose or suggest this combination of features.

For example, BARRETT et al. does not disclose or suggest modifying at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server. The Examiner groups the rejection of claim 10 with the rejection of claim 1 (final Office Action, pg. 3). Claim 1, however, does not recite modifying at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server. The Examiner does not address this feature of claim 10. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 10.

Nonetheless, Applicants submit that pg. 510, col. 1, lines 22-45, pg. 512, col. 1, lines 42-44, Fig. 1, Fig. 5B, and Table 1 of BARRETT et al. do not disclose or suggest modifying at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

As set forth above, pg. 510, col. 1, lines 21-45, of BARRETT et al. discloses that an intermediary may be used for web personalization, such as adding annotations to a page with

user notes or customized links, adding alerts to related web pages, or adding new resources (e.g., personal search engines), and document caching. This section of BARRETT et al. in no way discloses or suggests modifying at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

At pg. 512, col. 1, lines 42-44, BARRETT et al. discloses that editors modify outgoing requests for incoming documents and generators produce documents in response to requests. This section of BARRETT et al. in no way discloses or suggests that the editors or generators modify at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

Fig. 1 of BARRETT et al. depicts that a request for a document is sent from a browser to an intermediary. If the requested document is not in the local cache of the intermediary, it is forwarded to the server intermediary, which produces the document. The document passes through a customization intermediary that personalizes the document and then returns it to the browser (see pg. 510, col. 2). This figure of BARRETT et al. in no way discloses or suggests that the intermediary (or any other device in Fig. 1) modifies at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

Fig. 5 of BARRETT et al. (BARRETT et al. does include a Fig. 5B so Applicants assume that the Examiner intended to rely on Fig. 5 and not Fig. 5B) depicts the use of several Web

Browser Intelligence (WBI) plugins that improve a wireless web browser. This figure of BARRETT et al. in no way discloses or suggests that the WBI plugins modify at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

Table 1 of BARRETT et al. discloses that the Monitor/Editor/Generator (MEG) building blocks used to build intermediary applications include a request editor that can modify requests, a generator that produces a document that can satisfy a request or rejects a request, a document editor that can modify a document (which could be text, HTML, image, applet, etc.), a monitor that can receive a request and resulting document and perform some computation (e.g., gather statistics), and an autonomous block that can perform background computations that are not affiliated with a particular transaction (e.g., calculate user browsing statistics). Table 1 of BARRETT et al. in no way discloses or suggests that any of the above MEG building blocks modifies at least one of the function or property statements within the script portion of the markup language document to facilitate access to other resources residing on one or more remote servers through the intermediary server, as required by Applicants' claim 10.

For at least the foregoing reasons, Applicants submit that claim 10 is patentable over BARRETT et al.

Claims 11-15 depend from claim 10. Therefore, these claims are patentable over BARRETT et al. for at least the reasons given above with respect to claim 10. Moreover, these claims recite additional features not disclosed or suggested by BARRETT et al.

For example, claim 11 recites that the modifying includes scanning the markup language

document to locate the script portion, searching the script portion to locate a predetermined function or property statement, and replacing the predetermined function or property statement with a function call. The Examiner groups the rejection of claim 11 with the rejection of claim 4 (final Office Action, pg. 5). Claim 4, however, does not recite searching the script portion to locate a predetermined function or property statement or replacing the predetermined function or property statement with a function call. The Examiner has completely ignored these features of claim 11. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 11.

Nonetheless, Applicants submit that pg. 512, col. 1, lines 17-30, BARRETT et al. does not disclose or suggest the features of claim 11. As described above, at pg. 512, col. 1, lines 17-30, BARRETT et al. discloses that WBI can be used as an architecture for intermediaries. This section of BARRETT et al. in no way discloses or suggests scanning the markup language document to locate the script portion, searching the script portion to locate a predetermined function or property statement, and replacing the predetermined function or property statement with a function call, as required by Applicants' claim 11.

For at least these additional reasons, Applicants submit that claim 11 is patentable over BARRETT et al.

Independent claims 16 and 20 recite features similar to features recited above with respect to claim 1. Therefore, Applicants submit that claims 16 and 20 are patentable over BARRETT et al. for reasons similar to reasons given above with respect to claim 1.

Claims 23-29 depend from claim 20. Therefore, these claims are patentable over BARRETT et al. for at least the reasons given above with respect to claim 20.

Independent claims 17 and 21 recite features similar to features recited above with respect to claim 10. Therefore, Applicants submit that claims 17 and 21 are patentable over BARRETT et al. for reasons similar to reasons given above with respect to claim 10.

Claims 18 and 19 and 30-34 depend from claim 17 and 21, respectively. Therefore, these claims are patentable over BARRETT et al for at least the reasons given above with respect to claims 17 and 21.

New claims 35-37 disclose further features not disclosed or suggested by BARRETT et al. For example, independent claim 35 is directed to a computer readable media including at least computer program code that, when executed by at least one processor in an intermediary server, performs a method for processing requests. The computer readable media includes computer program code for receiving, at the intermediary server, a request from a client device for an item; computer program code for determining whether the item is a hyper text markup language (HTML) document; computer program code for forwarding the item to the client device when the item is determined not to be a HTML document; computer program code for performing, when the item is determined to be a HTML document, at least one of inserting a toolbar into the HTML document or replacing a uniform resource locator (URL) within the HTML document with a replacement URL to produce a modified HTML document; and computer program code for forwarding the modified HTML document to the client device. BARRETT et al. does not disclose or suggest this combination of features.

Claims 36 and 37 depend from claim 35. Therefore, these claims are patentable over BARRETT et al. for at least the reasons given above with respect to claim 35.

In view of the foregoing amendment and remarks, Applicants respectfully request the

Examiner's reconsideration of the application and the timely allowance of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

HARRITY & SNYDER, L.L.P.

By: _____
John E. Harrity
Reg. No. 43,367

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11240 Waples Mill Road
Suite 300
Fairfax, Virginia 22030
Telephone: (571) 432-0800
Facsimile: (571) 432-0808